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INSTITUTE FOR
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September 3, 1999

In Re Docket No. 98N-0359

Dockets Management Branch
HFA-305
Food & Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

To the FDA/CFSAN:

In response to your notice for comments for Program Priorities in the Center for Food Safety & Applied Nutrition, the Pennsylvania Institute for Community Services submits the following comments.

1. With respect to products under the jurisdiction of CFSAN, PICS strongly urges CFSAN to seriously revisit the **rBGH** issue and reexamine important data which has been raised by the FDA's counterpart in Canada (Health Canada) and by the eminent scientific committee of the European Union. The EU's review is the most comprehensive scientific review which has been conducted of potential health risks from **rBGH**. After many months of study, it is our considered judgment that important data has been neglected in U.S. studies and combined with previously identified conflicts of interest within the FDA and corporate enterprises, a new complete, unbiased review of **rBGH** is warranted.
2. Within the 10 program areas identified for priorities by CFSAN, PICS identifies the Premarket Review of Food Ingredients and Chemical and Other Contaminants as significant areas of concern. Unlike many groups and individuals that have identified reasons why many young people are being "scraped off the walls of many of our school rooms," PICS strongly believes that solid research which has been done by outstanding researchers such as Dr. Richard Wurtman of MIT shows the **cause** of such actions. His work on Aspartame, in particular, should be noted. Fundamental causes of violent behavior is being largely ignored -- causes which find their bases in food additives, chemicals and processes which have been found to have serious adverse effects on both young and older people alike -- but have a more critical effect on the developing of brains of young people. These effects are all the more significant when many of these ingredients, chemicals, et al are grouped together and utilized in a particular food pro-

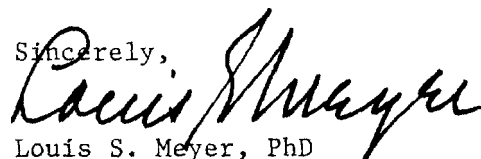
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duct. In most cases, while some of the ingredients mentioned may be safe as a single ingredient, having tested them in concert with other ingredients, has never been done. Thus, the Pre-market Review of any unnatural, chemical or other ingredient should be carried out in a completely thorough and unbiased manner.

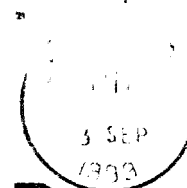
3. The highest priority areas for research? With statements emanating from the Center for Disease Control reporting that the U.S. is moving within the next 25 years of seeing 25% of Americans being mentally ill, it is PICS position that far more attention must be given by the FDA/CFSAN to what is going into our food supply. Research has shown that ingredients such as aspartame, monosodium glutamate, partially hydrogenated oils, texturized vegetable protein and others are causing serious negative effects on our population.
4. The highest priority international activities? Clearly it must be in the area of food commodities which are being "treated" with harmful pesticides, many of which are originating in the U.S. Several of our constituents have become ill from red raspberries imported by the U.S. supermarket industry from Chile. If the U.S. is to ban certain harmful chemicals in food production, then these chemicals should also be banned on food commodities being brought into the U.S. Sanctions are available for such actions. The question is whether the U.S. Government is willing to utilize such measures and actions. But, the Chilean products are not the only ones which must be dealt with. Others exist around the globe and many are the result of U.S. chemical companies shipping thousands of tons of chemicals for use by the global companies involved in food commodities.

Sincerely,



Louis S. Meyer, PhD
Director

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